## UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re: Chapter 7 Bky. No. 24-30167

Pro-Mark Services, Inc.,

Debtor,

Erik A. Ahlgren, as Chapter 7 Trustee of Bankruptcy Estate of Pro-Mark Services, Inc., and as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan,

Adv. No. 24-07014

Plaintiff,

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

v.

Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, Kyle R. Berg Revocable Living Trust, Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Rule 9010(b), Brian D. Larson and Andrew D. Cook of Ohnstad Twichell, P.C., hereby enter their appearance as counsel in this matter on behalf of Defendant Mandy Grant, and requests that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the contact information below:

Brian D. Larson Andrew D. Cook OHNSTAD TWICHELL, P.C. 444 Sheyenne Street, Suite 102 West Fargo, ND 58078-0458 Tel: (701) 282-3249

Email: blarson@ohnstadlaw.com Email: acook@ohnstadlaw.com

Filed 09/25/24 Entered 09/25/24 16:50:47 Desc Main Case 24-30167 Doc 135 Document Page 2 of 2

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the

notices and papers referred to in the Bankruptcy Rules specified above but also includes, without

limitation, any notice, application, complaint, demand, motion, petition, pleading or request,

whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery,

telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and all

proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

subsequent appearance, pleading, claim or suit is intended to waive any defenses or rights that may

be asserted in this matter, including a challenge to subject matter and personal jurisdiction to hear

this case.

Dated: September 25, 2024.

Respectfully submitted,

/s/ Andrew D. Cook

Brian D. Larson, ND ID #08568

Andrew D. Cook, ND ID # 06278

OHNSTAD TWICHELL, P.C.

444 Sheyenne Street, Suite 102

P.O. Box 458

West Fargo, ND 58078-0458

Tel: (701) 282-3249 Fax: (701) 282-0825

Email: blarson@ohnstadlaw.com

Email: acook@ohnstadlaw.com

Counsel for Defendant Mandy Grant

2